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ALAN H. MARTIN, State Bar No. 132301  
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
A Limited Liability Partnership  
Including Professional Corporations  
Four Embarcadero Center, 17<sup>th</sup> Floor  
San Francisco, California 94111-4109  
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Facsimile: (415) 434-3947  
Email: okatz@sheppardmullin.com  
amartin@sheppardmullin.com

Attorneys for The Roman Catholic Archbishop of  
San Francisco

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

Debtor and  
Debtor in Possession.

Case No. 23-30564

Chapter 11

**MONTHLY PROFESSIONAL FEE  
STATEMENT FOR SHEPPARD, MULLIN,  
RICHTER & HAMPTON LLP  
MARCH 2024**

**TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

**NOTICE IS HEREBY GIVEN** that Sheppard, Mullin, Richter and Hampton LLP, (hereinafter “Sheppard Mullin”), attorneys for debtor and debtor in possession The Roman Catholic Archbishop of San Francisco (the “Debtor”), hereby files its *Monthly Professional Fee Statement for March 2024*. Under the *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a Monthly Basis* entered by the Court on October 16, 2023 [ECF No. 212], the total legal fees earned and expenses incurred by Sheppard Mullin on account of the Debtor for March 2024 are as follows:

Period	Fees	Expenses (Disbursements)	Total
March 1 – March 31, 2024	\$126,608.80	\$0.00	\$126,608.80
Net Total Allowed Payments this Statement Period: (80% of Fees and 100% of Costs)	\$101,287.04	\$0.00	\$101,287.04

1 The itemized billing statement for the fees and costs billed for March 2024 is attached hereto  
2 as **Exhibit 1**. The Net Total Allowed Payments detailed above shall be paid from funds held by the  
3 Debtor's estate unless an objection is filed with the Clerk of the Court and served upon Sheppard  
4 Mullin within 14 days from the date of service of this Statement.

5 Dated: April 19, 2024

6 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

7  
8 By

/s/ Ori Katz

ORI KATZ  
ALAN H. MARTIN  
Attorneys for The Roman Catholic  
Archbishop of San Francisco

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**Exhibit 1**

March 2024 Invoice

**Remittance Copy*****Please return this page with your payment.***Fr. Patrick Summerhays  
Vicar General and Moderator of the Curia  
The Roman Catholic Archbishop of San Francisco  
One Peter Yorke Way  
San Francisco, CA 94109SMRH Tax ID 95-1463164  
April 19, 2024  
Invoice 380102598Our Matter No. 90YY-375176  
The Roman Catholic Archbishop of San Francisco - Evaluation of Strategic  
Alternatives  
Billing Atty: Ori Katz**INVOICE SUMMARY**

FOR PROFESSIONAL SERVICES THROUGH MARCH 31, 2024

Current Fees	\$ 155,244.00
Total Current Activity	\$ 155,244.00
Fee Discount	----- \$ (28,635.20)
Total Due for This Invoice	=====

**DUE IMMEDIATELY UPON RECEIPT****Inquiries: [armbx@sheppardmullin.com](mailto:armbx@sheppardmullin.com) or contact 213-455-7771****Electronic Payments**

Account Name: Sheppard Mullin Richter & Hampton LLP  
Beneficiary Bank: Wells Fargo Bank, NA  
420 Montgomery St  
San Francisco, CA 94104-1298

Account No.: 496-8375493  
ACH ABA No.: 121000248  
Wire ABA No.: 121000248  
Swift Identifier: WFBIOUS6S

**Payment by Check**

Sheppard Mullin Richter & Hampton LLP  
PO Box 840728  
Los Angeles, CA 90084-0728

**Overnight Mail Delivery**

Sheppard Mullin Richter & Hampton LLP  
Wells Fargo Bank Lockbox Services  
Lockbox 840728  
3440 Flair Drive  
El Monte, CA 91731-2823

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Ori Katz

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**SUMMARY OF TIMEKEEPER FEES**

<b><u>Timekeeper Name</u></b>	<b><u>Hours</u></b>	<b><u>Avg. Rate/Hr</u></b>	<b><u>Dollars</u></b>
Alan H. Martin	14.20	\$ 1,032.00	\$ 14,654.40
Ori Katz	30.10	\$ 1,172.00	\$ 35,277.20
Jennifer L. Nassiri	40.20	\$ 1,056.00	\$ 42,451.20
Amanda L. Cottrell	15.10	\$ 908.00	\$ 13,710.80
Jeannie Kim	41.50	\$ 804.00	\$ 33,366.00
Steven G. Gersten	8.60	\$ 804.00	\$ 6,914.40
Matt Benz	4.00	\$ 600.00	\$ 2,400.00
Eduardo G. Linares	3.30	\$ 556.00	\$ 1,834.80

Fr. Patrick Summerhays  
Vicar General and Moderator of the Curia  
The Roman Catholic Archbishop of San Francisco  
One Peter Yorke Way  
San Francisco, CA 94109

SMRH Tax ID 95-1463164

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Our Matter No. 90YY-375176  
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420 Montgomery St Wire ABA No.: 121000248  
San Francisco, CA 94104-1298 Swift Identifier: WFBUS6S

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FOR PROFESSIONAL SERVICES THROUGH 03/31/24

**FEE DETAIL**

**Relief from Stay and Adequate Protection Proceedings**

03/05/24 Corrospended with L. Parada (USBC) regarding stay relief motion (.1).

Jeannie Kim .10 hrs.

*Timekeeper Summary of: Relief from Stay and Adequate Protection  
Proceedings*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Jeannie Kim	0.10	\$ 804.00	\$ 80.40
<i>Totals</i>	0.10	\$ 804.00	\$ 80.40

**Meetings of and Communications with Creditors**

03/04/24 Participate in meet and confer with committee counsel to discuss objections to  
committee discovery requests (.9).

Ori Katz .90 hrs.

03/05/24 Participate in weekly call with committee counsel to go over case status checklist (.8).

Ori Katz .80 hrs.

03/05/24 Reviewed correspondence between B. Michael and L. Parada regarding creditor  
appearances at Zoom hearings (.1).

Jeannie Kim .10 hrs.

03/06/24 Reviewed items received from Committee as to pending motions, open discovery  
issues, etc.

Alan H. Martin .40 hrs.

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03/08/24	Corresponded with B. Michael regarding survivor appearances at Zoom hearings (.1).
	Jeannie Kim .10 hrs.
03/12/24	Participate in weekly check-in call with counsel for creditors committee (.3).
	Ori Katz .30 hrs.
03/19/24	Participate in standing call with committee counsel, with focus on their discovery concerns (1.0).
	Ori Katz 1.00 hrs.
03/21/24	Draft email to committee following up on the open issues raised re discovery disputes (1.1).
	Ori Katz 1.10 hrs.
03/22/24	Revisions to email memorandum to committee re discovery matters of concern to committee counsel (.7).
	Ori Katz .70 hrs.
03/22/24	Reviewed draft correspondence to committee regarding status of discovery responses (.2).
	Jeannie Kim .20 hrs.
03/26/24	Attend weekly call with committee counsel to discuss mediation update and status of open discovery matters (.9).
	Ori Katz .90 hrs.
03/26/24	Investigation into committee inquiry re bylaws or other governance documents for non-debtor entities (.4).
	Ori Katz .40 hrs.



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*Timekeeper Summary of: Meetings of and Communications with Creditors*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Alan H. Martin	0.40	\$ 1,032.00	\$ 412.80
Ori Katz	6.10	\$ 1,172.00	\$ 7,149.20
Jeannie Kim	0.40	\$ 804.00	\$ 321.60
<i>Totals</i>	6.90	\$ 1,142.55	\$ 7,883.60

**Fee/Employment Applications & Statements**

03/04/24	Reviewed and responded to fee examiner's request for Sheppard Mullin LEDES data (first interim fee application) (.3); conferred and corresponded with J. Blumberg regarding same (.1).
	Jeannie Kim .40 hrs.
03/11/24	Reviewed and removed privileged information from February Sheppard Mullin monthly fee statement (.2).
	Jeannie Kim .20 hrs.
03/14/24	Continued review and removal of privileged information from Sheppard Mullin monthly fee statement (.3).
	Jeannie Kim .30 hrs.
03/15/24	Further reviewed and revised Sheppard Mullin monthly fee statement to remove privileged information (.4).
	Jeannie Kim .40 hrs.
03/18/24	Correspondence with client re monthly fee statement and related items.
	Alan H. Martin .20 hrs.
03/18/24	Further revised to remove privileged information on Sheppard Mullin monthly fee statement (1.7); corresponded with Z. Samuell (TransPerfect) regarding outstanding invoices (.2); addressed same with W. Weitz and A. Martin (.1).

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	Jeannie Kim	2.00 hrs.
03/19/24	Exchanged correspondence and data with client concerning Transperfect engagement and services rendered.	
	Alan H. Martin	.40 hrs.
03/19/24	Reviewed monthly fee statements for TransPerfect (.2) and Sheppard Mullin invoices (.4); reviewed and responded to correspondence from M. Flanagan regarding TransPerfect invoices (.6); corresponded with Z. Samuell requesting revisions to TransPerfect invoice (.2).	
	Jeannie Kim	1.40 hrs.
03/19/24	Drafted SMRH Monthly Fee Statement for February (.4).	
	Eduardo G. Linares	.40 hrs.
03/19/24	Drafted TransPerfect Monthly Fee Statement for February outstanding invoices (.8).	
	Eduardo G. Linares	.80 hrs.
03/20/24	Reviewed TransPerfect invoices (.5); conferred (.4) and corresponded (.4) with Z. Samuell regarding treatment of TransPerfect invoices in light of interim compensation procedures; reviewed and revised TransPerfect monthly fee statement (.3); conferred and corresponded with D. Brill regarding TransPerfect invoices (.5).	
	Jeannie Kim	2.10 hrs.
03/21/24	Reviewed U.S. Trustee concerns regarding Sheppard Mullin fee application (.1); corresponded with P. Pascuzzi regarding U.S. Trustee/fee examiner objection deadline (.1).	
	Jeannie Kim	.20 hrs.
03/25/24	Corresponded with D. Brill regarding TransPerfect invoices (.1).	
	Jeannie Kim	.10 hrs.
03/26/24	Drafted supplemental declaration of O. Katz in support of first interim fee application (1.3); conferred with D. Brill and Z. Samuell regarding TransPerfect compensation (.2); telephone call to J. Blumberg (.1) and B. Michael (.1) regarding same.	
	Jeannie Kim	1.70 hrs.

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03/27/24 Prepared draft correspondence to U.S. Bankruptcy Court regarding fee examiner review of fee applications (.2); telephone conference with B. Michael regarding TransPerfect invoices (.1); telephone call to J. Blumberg regarding same (.1).

Jeannie Kim .40 hrs.

03/28/24 Corresponded with E. Frejka and L. Parada (USBC) regarding continued hearing on first interim fee applications (.2); reviewed and revised notice of continued same (.3); corresponded with B. Jennings regarding preparation of same (.1).

Jeannie Kim .60 hrs.

03/28/24 Drafted notice of continued hearing regarding First Interim Applications.

Eduardo G. Linares 1.70 hrs.

03/31/24 Corresponded with M. Flanagan regarding TransPerfect invoice (.2); reviewed and revised notice of continued hearing on first interim fee applications (.5).

Jeannie Kim .70 hrs.

*Timekeeper Summary of: Fee/Employment Applications & Statements*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Alan H. Martin	0.60	\$ 1,032.00	\$ 619.20
Jeannie Kim	10.50	\$ 804.00	\$ 8,442.00
Eduardo G. Linares	2.90	\$ 556.00	\$ 1,612.40
<i>Totals</i>	14.00	\$ 762.40	\$ 10,673.60

**Assumption/Rejection of Leases and Contracts**

02/28/24 Drafted certificate of no objection to debtor's second motion to extend deadline to unexpired leases.

Eduardo G. Linares .40 hrs.

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03/01/24 Reviewed and revised draft certificate of service regarding certificate of no objection regarding extension of assumption/rejection deadline (.1); corresponded with P. Pascuzzi regarding status of proposed order regarding same (.1).

Jeannie Kim .20 hrs.

*Timekeeper Summary of: Assumption/Rejection of Leases and Contracts*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Jeannie Kim	0.20	\$ 804.00	\$ 160.80
Eduardo G. Linares	0.40	\$ 556.00	\$ 222.40
<i>Totals</i>	0.60	\$ 638.67	\$ 383.20

**Case Administration - General**

03/01/24 Call with debtor to discuss case update on pending matters (.5).

Ori Katz .50 hrs.

03/05/24 Prepared for weekly debtor professionals' call (.6).

Jeannie Kim .60 hrs.

03/06/24 Prepared for (.2) and attended (.5) professionals team call.

Alan H. Martin .70 hrs.

03/06/24 Participated in weekly debtor professionals' call (.6).

Jeannie Kim .60 hrs.

03/06/24 Reviewed draft memorandum to client regarding case strategy (.1).

Jeannie Kim .10 hrs.

03/14/24 Correspondence with co-counsel concerning items for today's team call.

Alan H. Martin .10 hrs.

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03/14/24	Attended debtor professionals team call.	
	Alan H. Martin	.60 hrs.
03/14/24	Prepared for weekly debtor professionals' call (.2); participated in same (.5).	
	Jeannie Kim	.70 hrs.
03/18/24	Reviewed BRG employment application and signed confidentiality agreement to confirm personnel staffed on case (.2).	
	Jeannie Kim	.20 hrs.
03/20/24	Reviewed various correspondence received from client as to Transperfect.	
	Alan H. Martin	.40 hrs.
03/20/24	Prepared for (.1) and attended (.5) professionals committee call.	
	Alan H. Martin	.60 hrs.
03/20/24	Participate in portion of call among debtor professionals to discuss case status checklist (.5).	
	Ori Katz	.50 hrs.
03/20/24	Prepared for weekly debtor professionals' call (.3); participated in same (.5).	
	Jeannie Kim	.80 hrs.
03/28/24	Prepared for weekly debtor professionals call (.2).	
	Jeannie Kim	.20 hrs.
03/29/24	Attended professionals' team call.	
	Alan H. Martin	.50 hrs.
03/29/24	Participate in call with debtor professionals to go over running checklist of open items (.5).	
	Ori Katz	.50 hrs.

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03/29/24 Participated in weekly debtor professionals call (.5).

Jeannie Kim .50 hrs.

*Timekeeper Summary of: Case Administration - General*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Alan H. Martin	2.90	\$ 1,032.00	\$ 2,992.80
Ori Katz	1.50	\$ 1,172.00	\$ 1,758.00
Jeannie Kim	3.70	\$ 804.00	\$ 2,974.80
<i>Totals</i>	8.10	\$ 953.78	\$ 7,725.60

**Claims and Plan**

03/01/24 Analysis of next steps re mediation in light of email from committee re mediators (.4).

Ori Katz .40 hrs.

03/06/24 Follow up with potential mediator candidates to arrange for in-person meetings to discuss potential mediation (1.7).

Ori Katz 1.70 hrs.

03/06/24 Analysis of multiple emails regarding potential mediation with Committee.

Jennifer L. Nassiri .20 hrs.

03/06/24 Reviewed mediation strategy (.3).

Jeannie Kim .30 hrs.

03/08/24 Follow up with potential mediator re involvement in case (.4).

Ori Katz .40 hrs.

03/11/24 Began review and revisions to draft motion to mediate disputes (.3).

Jeannie Kim .30 hrs.

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03/12/24	Revised draft motion seeking appointment of mediator (1.1).	
	Ori Katz	1.10 hrs.
03/12/24	Further reviewed and revised mediation motion (1.8).	
	Jeannie Kim	1.80 hrs.
03/13/24	Revise draft motion seeking court approval of mediation with committee and other major stakeholders (1.6).	
	Ori Katz	1.60 hrs.
03/13/24	Review draft motion to compel mediation in connection with formulation of plan of reorganization.	
	Jennifer L. Nassiri	.30 hrs.
03/13/24	Reviewed and revised draft mediation motion (.6); developed strategy regarding same (.2).	
	Jeannie Kim	.80 hrs.
03/14/24	Reviewed and revised draft motion requesting referral to mediation (.8).	
	Jeannie Kim	.80 hrs.
03/18/24	Call with Mr. Gaspari to prepare for meeting with Judge Sontchi as potential mediator (.2).	
	Ori Katz	.20 hrs.
03/18/24	Prepare notes for meeting with Judge Sontchi as potential mediator (.3).	
	Ori Katz	.30 hrs.
03/19/24	Finalize preliminary statement in the motion to seek mediation (.6).	
	Ori Katz	.60 hrs.
03/19/24	Meet with potential mediator Judge Sontchi and Paul Gaspari to discuss contours of potential future mediation (1.3).	

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	Ori Katz	1.30 hrs.
03/19/24	Reviewed revised draft motion for referral to mediation (.3).	
	Jeannie Kim	.30 hrs.
03/20/24	Corresponded with client and special counsel regarding draft mediation brief (.2); reviewed draft comments from P. Gaspari and responded to same (.3).	
	Jeannie Kim	.50 hrs.
03/21/24	Call with debtor to discuss revisions to motion seeking approval to mediate with major parties in interest (.6).	
	Ori Katz	.60 hrs.
03/21/24	Discussion among debtor professionals re mediation (.4).	
	Ori Katz	.40 hrs.
03/21/24	Conferred with debtor's special counsel regarding draft mediation motion (.7); further reviewed and revised same (.4).	
	Jeannie Kim	1.10 hrs.
03/22/24	Further revised draft motion for referral to mediation (.2); reviewed correspondence to P. Gaspari and P. Carney regarding same (.1).	
	Jeannie Kim	.30 hrs.
03/29/24	Emails with Mr. Gaspari re potential mediator candidate in the event alternative candidate is unavailable (.2).	
	Ori Katz	.20 hrs.
03/29/24	Reviewed correspondence to committee regarding proposed mediators (.1).	
	Jeannie Kim	.10 hrs.



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*Timekeeper Summary of: Claims and Plan*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Ori Katz	8.80	\$ 1,172.00	\$ 10,313.60
Jeannie Kim	6.30	\$ 804.00	\$ 5,065.20
Jennifer L. Nassiri	0.50	\$ 1,056.00	\$ 528.00
<i>Totals</i>	15.60	\$ 1,019.67	\$ 15,906.80

**Claims Administration and Objections**

03/04/24	Corresponded with G. Miller and Omni regarding Travelers and Dentons access to confidential claims (.3).
	Jeannie Kim .30 hrs.
03/05/24	Corresponded with B. Whitaker and P. Pascuzzi regarding allegedly late filed claim (.2); corresponded with B. Whitaker and T. Phinney regarding privileged form of claims register (.1); drafted Rodriguez declaration regarding supplemental notice of bar date (1.3)
	Jeannie Kim 1.60 hrs.
03/06/24	Prepared update to bar date compliance issues.
	Alan H. Martin .30 hrs.
03/06/24	Continued drafting Rodriguez declaration regarding supplemental compliance with bar date order (.3); corresponded with A. Frankel regarding Century Indemnity, et al. access to survivor claims (.2).
	Jeannie Kim .50 hrs.
03/07/24	Analyzed information received concerning claims notice compliance and supplemental steps.
	Alan H. Martin .40 hrs.
03/08/24	Corresponded with G. miller and Omni regarding Travelers access to confidential survivor claims (.2).

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	Jeannie Kim	.20 hrs.
03/10/24	Continued drafting Rodriguez declaration regarding supplemental notice of bar date (.1); reviewed correspondence from M. Norton regarding London Market Insurance position regarding confidential survivor claims (.2).	
	Jeannie Kim	.30 hrs.
03/11/24	Revised draft report re items as to bar claim notice compliance, etc.	
	Alan H. Martin	.30 hrs.
03/11/24	Exchanged various correspondence with co-counsel re claim notice compliance, etc.	
	Alan H. Martin	.20 hrs.
03/11/24	Further reviewed and revised R. Rodriguez declaration in support of additional notice of bar date given to potential survivor claimants (.3); corresponded with T. Phinney regarding same (.1); further reviewed and revised Rodriguez declaration (.5); corresponded with A. Frankel and Omni regarding Century Indemnity and Westchester Fire Ins. regarding access to confidential claims (.1); corresponded with J. Chorley (Clyde) regarding same (.3); corresponded with C. Sugayan and M. Norton regarding Clyde personnel access (.2); corresponded with Omni regarding Clyde access for Century Indemnity and Westchester Fire Ins. (.1).	
	Jeannie Kim	1.60 hrs.
03/12/24	Revised draft report items as to bar claim notice compliance, etc.	
	Alan H. Martin	.40 hrs.
03/12/24	Exchanged various correspondence with co-counsel re claim notice compliance, etc.	
	Alan H. Martin	.30 hrs.
03/12/24	Corresponded with T. Phinney and P. Pascuzzi regarding details of supplemental notice given to potential survivors (.3); correspondence and telephone call to R. Rodriguez regarding same (.2); further reviewed and revised declaration of same regarding same (.3).	
	Jeannie Kim	.80 hrs.

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03/13/24 Drafted stipulation regarding litigation-related administrative claims (1.1); telephone conference with R. Rodriguez regarding supplemental notice given to survivor claimants regarding bar date (.6); corresponded with R. Rodriguez requesting review and execution of declaration regarding same (.1).

Jeannie Kim 1.80 hrs.

03/13/24 Corresponded with G. Miller and B. Whitaker regarding Travelers' access to confidential survivor claims (.1).

Jeannie Kim .10 hrs.

03/14/24	Finalized Rodriguez declaration regarding supplemental notice given of bar date (.1); updated claims confidentiality agreement tracker (.2).
----------	--

Jeannie Kim .30 hrs.

03/15/24      Corresponded with R. Rodriguez requesting review and execution of declaration is supplemental notice given of bar date (.1).

Jeannie Kim .10 hrs.

03/19/24	Corresponded with M. Weiss regarding carrier executed claims confidentiality agreements (.1); updated tracker regarding same (.1).
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Jeannie Kim .20 hrs.

03/19/24      Corresponded with B. Michael and B. Whitaker regarding survivor claims count (.2).

Jeannie Kim .20 hrs.

03/20/24	Continued preparation of summary of declarations regarding compliance with bar date order (.1); corresponded with B. Michael and P. Pascuzzi regarding confidential claims count (.1).
----------	--

Jeannie Kim .20 hrs.

03/21/24      Corresponded with B. Whitaker and M. Weiss regarding access to confidential survivor claims to certain insurers (.3); updated claims confidentiality agreement tracker (.1); corresponded with B. Whitaker regarding form of claims register (.2).

Jeannie Kim .60 hrs.

03/21/24      Corresponded with B. Whitaker regarding confidential claims count (.2).

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	Jeannie Kim	.20 hrs.
03/22/24	Corresponded with P. Pascuzzi regarding confidential claims (.1); corresponded with M. Weiss regarding carrier access to confidential survivor claims (.1); corresponded with M. Norton regarding same (.1); corresponded with B. Whitaker regarding carrier access to survivor claims (.1).	
	Jeannie Kim	.40 hrs.
03/25/24	Corresponded with M. Norton regarding confidential survivor claims (.1).	
	Jeannie Kim	.10 hrs.
03/27/24	Corresponded with M. Norton regarding insurance coverage and confidential claims (.1).	
	Jeannie Kim	.10 hrs.
03/30/24	Corresponded with K. Cifarelli regarding access to claims (.2).	
	Jeannie Kim	.20 hrs.

*Timekeeper Summary of: Claims Administration and Objections*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Alan H. Martin	1.90	\$ 1,032.00	\$ 1,960.80
Jeannie Kim	9.80	\$ 804.00	\$ 7,879.20
<i>Totals</i>	11.70	\$ 841.03	\$ 9,840.00

**Case Assessment, Development and Administration**

03/01/24	Began reviewing and revising draft memorandum to client regarding litigation strategy (.5).
	Jeannie Kim .50 hrs.
03/04/24	Reviewed and revised draft memorandum to client regarding litigation strategy (4.6).

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	Jeannie Kim	4.60 hrs.
03/05/24	Corresponded with R. Michelson regarding common interest agreement (.1); updated common interest execution tracker (.2); follow-up correspondence with R. Charles regarding common interest agreement (.1)	
	Jeannie Kim	.40 hrs.
03/06/24	Telephone conference with counsel for Benedict XVI regarding case developments and related issues.	
	Alan H. Martin	.60 hrs.
03/06/24	Corresponded with A. Diamond regarding common interest agreement (.2); corresponded with R. Charles regarding same (.1); follow-up regarding status of review and execution of same by certain non-debtor Catholic entities (.3); corresponded with P. Pascuzzi regarding counsel for non-debtor entities and strategy to coordinate with same (.1).	
	Jeannie Kim	.70 hrs.
03/07/24	Telephone conference with counsel for Catholic Charities regarding miscellaneous case developments.	
	Alan H. Martin	.50 hrs.
03/12/24	Corresponded with A. Diamond regarding review and execution of common interest agreement (.2).	
	Jeannie Kim	.20 hrs.
03/13/24	Corresponded with C. Johnson regarding executed common interest agreement (.1).	
	Jeannie Kim	.10 hrs.
03/14/24	Telephone conference with counsel Harris for High Schools as to miscellaneous data items.	
	Alan H. Martin	.40 hrs.
03/14/24	Reviewed status of review and execution of common interest agreement by certain Non-Debtor Catholic Entities (.1).	

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	Jeannie Kim	.10 hrs.
03/22/24	Review correspondence in connection with common interest agreement (.2).	
	Jennifer L. Nassiri	.20 hrs.
03/22/24	Updated common interest agreement to reflect CYO signatory (.1); corresponded with R. Michelson regarding same (.2).	
	Jeannie Kim	.30 hrs.
03/25/24	Review common interest agreement and related emails (.4).	
	Jennifer L. Nassiri	.40 hrs.
03/25/24	Reviewed final form of common interest agreement (.2).	
	Jeannie Kim	.20 hrs.
03/28/24	Prepared fully executed and compiled common interest agreement (.4).	
	Jeannie Kim	.40 hrs.
03/29/24	Finalized fully executed and compiled common interest agreement for circulation to signatories (.2).	
	Jeannie Kim	.20 hrs.

*Timekeeper Summary of: Case Assessment, Development and Administration*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Alan H. Martin	1.50	\$ 1,032.00	\$ 1,548.00
Jeannie Kim	7.70	\$ 804.00	\$ 6,190.80
Jennifer L. Nassiri	0.60	\$ 1,056.00	\$ 633.60
<i>Totals</i>	9.80	\$ 854.33	\$ 8,372.40

**Discovery**

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03/01/24	Prepared items/follow-up responses as to additional 2004 discovery requests and coordinated response.	
	Alan H. Martin	1.10 hrs.
03/01/24	Prepare for call with debtor to discuss status of committee discovery requests (1.3).	
	Ori Katz	1.30 hrs.
03/01/24	Call from Peter Califano re: Seminary.	
	Amanda L. Cottrell	.50 hrs.
03/01/24	Conference with Paul Gaspari re: abuse claims discovery issues.	
	Amanda L. Cottrell	.30 hrs.
03/02/24	Review and analyze client documents for ongoing discovery.	
	Amanda L. Cottrell	1.00 hrs.
03/04/24	Analyzed additional discovery items as to pending 2004 Committee demands.	
	Alan H. Martin	.60 hrs.
03/04/24	Confer with the Committee re objections and status of productions in response to abuse claim requests for production under Rule 2004 subpoena.	
	Steven G. Gersten	.90 hrs.
03/05/24	Analyzed research and data received regarding additional Committee discovery requests.	
	Alan H. Martin	.70 hrs.
03/05/24	Reviewed claims-related research received.	
	Alan H. Martin	.60 hrs.
03/05/24	Strategy discussion with Mr. Pascuzzi re posture of case heading into potential mediation (.2).	
	Ori Katz	.20 hrs.

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03/05/24	Discussion with BPM re the subpoena directed at them by the committee (.4).	
	Ori Katz	.40 hrs.
03/05/24	Overall analysis of discovery previewed by the committee to be directed at non-debtor entities (1.9).	
	Ori Katz	1.90 hrs.
03/05/24	Analysis of open discovery items in connection with financial documents and cooperation with committee (1.9); review and analysis of multiple emails regarding strategy for same (.6); review correspondence from L. Linksy regarding Sacred Heart discovery and response to same (.2); analysis of ex parte 2004 motion for BPM materials, order and related correspondence (.6).	
	Jennifer L. Nassiri	3.30 hrs.
03/05/24	Conference with S. Gersten re: Committee issues on abuse claims RFPs.	
	Amanda L. Cottrell	.40 hrs.
03/05/24	Conference call with O. Katz re discovery issues.	
	Amanda L. Cottrell	.70 hrs.
03/05/24	Correspondence with Debtors' lawyers re: Committee's RFPs.	
	Amanda L. Cottrell	.20 hrs.
03/05/24	Reviewed strategy regarding third party discovery targets (.1).	
	Jeannie Kim	.10 hrs.
03/06/24	Follow up with BPM re issues related to debtor files being produced (.9).	
	Ori Katz	.90 hrs.
03/06/24	Analysis of committee subpoena to BPM and multiple related e-mails (.3) in connection with call to discuss (.4); review correspondence in connection with BPM's retained counsel (.1).	
	Jennifer L. Nassiri	.80 hrs.



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03/06/24	Analysis of background documents in connection with document production issues including multiple first day declarations and motions (1.6); analysis of 2004 motion to Debtor, Debtor's response and multiple status reports in connection with status of current discovery disputes (1.5).	Jennifer L. Nassiri	3.10 hrs.
03/06/24	Conference call with B. Riley to discuss ongoing BRG data requests.	Amanda L. Cottrell	.50 hrs.
03/06/24	Correspondence to M. Flanagan and client representatives subpoena to auditor BPM.	Amanda L. Cottrell	.10 hrs.
03/06/24	Conference with M. Flanagan.	Amanda L. Cottrell	.40 hrs.
03/06/24	Reviewed strategy regarding response to committee's third party subpoena issued to debtor professional (.2).	Jeannie Kim	.20 hrs.
03/06/24	Reviewed strategy regarding third party subpoenas issued by committee (.2).	Jeannie Kim	.20 hrs.
03/07/24	Reviewed items received from Committee as to entity discovery requests.	Alan H. Martin	.40 hrs.
03/08/24	Call with counsel for BPM to discuss Rule 2004 subpoena from creditors' committee (.5).	Ori Katz	.50 hrs.
03/08/24	Analysis of requests for bankruptcy estate to pay fees incurred by third parties in connection with subpoenas from committee (1.0).	Ori Katz	1.00 hrs.
03/08/24	Further analysis of custodian notes to understand document policies and practice.		

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	Jennifer L. Nassiri	1.40 hrs.
03/08/24	Prepare for (.2) and attend (.5) conference call with Pillsbury re: third party subpoena to BPM.	
	Amanda L. Cottrell	.70 hrs.
03/11/24	Reviewed additional items received concerning data responses to 2004 requests.	
	Alan H. Martin	.50 hrs.
03/11/24	Review correspondence in connection with call with M. Flanagan (multiple emails) (.2); analysis of organizational chart of finance department and related narrative (.3).	
	Jennifer L. Nassiri	.50 hrs.
03/12/24	Analyzed items received concerning data responses to 2004 requests.	
	Alan H. Martin	.90 hrs.
03/12/24	Analysis of multiple cash management pleadings, opposition of UST and orders in connection with background information for ongoing discovery efforts.	
	Jennifer L. Nassiri	1.30 hrs.
03/12/24	Analysis of multiple emails regarding upcoming discovery calls.	
	Jennifer L. Nassiri	.20 hrs.
03/13/24	Call with debtor to discuss discovery being served on third parties by committee to extent of overlap with debtor discovery (.5).	
	Ori Katz	.50 hrs.
03/13/24	Call with BPM to discuss their production in response to subpoena (.5).	
	Ori Katz	.50 hrs.
03/13/24	Participate in call with M. Flanagan, P. Carney, P. Gaspari and SMRH team regarding BPM subpoena.	
	Jennifer L. Nassiri	.50 hrs.

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03/13/24 Reviewed documents re non-debtor Catholic Entities (.6); review correspondence regarding meet and confer with Committee on production issues (multiple emails) (.2); analysis of case law in connection with obligations of third party in discovery (.3); telephone call with committee counsel and S. Gersten regarding responses to request for production (stage 2) (.9); review and respond to emails regarding custodian depositions (.4); review correspondence regarding Seminary discovery (.1).

Jennifer L. Nassiri 2.50 hrs.

03/13/24 Conference with O. Katz, P. Gaspari, and J. Morse re BPM subpoena.

Amanda L. Cottrell 1.00 hrs.

03/13/24 Correspondence with A. Caine re: meet and confer.

Amanda L. Cottrell .10 hrs.

03/13/24 Meet and confer with B. Michael and A. Caine as counsel to the Committee re phase 2 objections and responses.

Steven G. Gersten 1.00 hrs.

03/13/24 Prepared summary of discovery for J. Nassiri (.3).

Matt Benz .30 hrs.

03/14/24 Review correspondence from O. Katz regarding BPM strategy on documents (.1).

Jennifer L. Nassiri .10 hrs.

03/14/24 Reviewed report regarding strategy related to committee subpoenas issued to third parties (.1).

Jeannie Kim .10 hrs.

03/15/24 Reviewed updated discovery response items to Committee 2004 demands.

Alan H. Martin .40 hrs.

03/15/24 Analysis of most recent batch of subpoenas sent by committee in conjunction with Rule 2004 order authorizing third party discovery (2.4).

Ori Katz 2.40 hrs.

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03/15/24	Telephone conference with counsel for committee and counsel for RPSC in connection with subpoena (.5); review correspondence and subpoenas to RPSC and Cemeteries (.4).	
	Jennifer L. Nassiri	.90 hrs.
03/15/24	Review correspondence and subpoenas to Vallombrosa Retreat Center, Benedict XVI Institute and CASC (.7).	
	Jennifer L. Nassiri	.70 hrs.
03/15/24	Review correspondence in connection with data from Sage and BRG access (.3); review correspondence from W. Weitz regarding same (multiple emails) (.3).	
	Jennifer L. Nassiri	.60 hrs.
03/15/24	Researched case law and other legal authorities in support of Debtor's responses and objections to Committee's Stage 4 Rule 2004 subpoena (3.7).	
	Matt Benz	3.70 hrs.
03/16/24	Call with Mr. Pascuzzi and Ms. Cottrell to discuss committee discovery disputed matters (1.0).	
	Ori Katz	1.00 hrs.
03/16/24	Analyze third party subpoenas against discovery status and files.	
	Amanda L. Cottrell	.50 hrs.
03/16/24	Attention to tracking Debtor document production and continuing investigation.	
	Amanda L. Cottrell	.50 hrs.
03/16/24	Conference with O. Katz and P. Pascuzzi re: open issues in discovery.	
	Amanda L. Cottrell	1.00 hrs.
03/19/24	Revised stipulation to address fees and expenses incurred by non-debtor recipients of subpoenas (.7).	
	Ori Katz	.70 hrs.

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03/19/24	Call among debtor professionals to discuss concerns raised by committee re production of documents to date (.5).	
	Ori Katz	.50 hrs.
03/22/24	Draft status update re production of financial information in response to the Committee's Rule 2004 subpoena.	
	Steven G. Gersten	1.00 hrs.
03/25/24	Analysis of committee's "low hanging fruit" discovery requests to asses debtor response to same following conferral with committee (1.9).	
	Ori Katz	1.90 hrs.
03/25/24	Review correspondence from C. Johnson regarding call to discuss CASC discovery (.1); participate in call with S. Gersten and counsel for CASC regarding strategy (.8).	
	Jennifer L. Nassiri	.90 hrs.
03/25/24	Review correspondence regarding status of RPSC discovery (.1).	
	Jennifer L. Nassiri	.10 hrs.
03/25/24	Review BPM fees.	
	Amanda L. Cottrell	.20 hrs.
03/25/24	Review and analyze matters related to real property records.	
	Amanda L. Cottrell	1.00 hrs.
03/26/24	Analyzed information received re Committee discovery requests.	
	Alan H. Martin	.40 hrs.
03/26/24	Reviewed various correspondence received from the client team as to discovery steps.	
	Alan H. Martin	.20 hrs.
03/26/24	Telephone conference with P. Califano, M. Raja and S. Gersten regarding Seminary responses to document request (.6); analysis of multiple emails regarding strategy on status of multiple discovery requests to non-debtor affiliates (.8).	

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	Jennifer L. Nassiri	1.40 hrs.
03/26/24	Telephone conference with R. Michaelson regarding committee subpoena (.2).	
	Jeannie Kim	.20 hrs.
03/27/24	Prepared discovery response items re Committee discovery requests.	
	Alan H. Martin	.30 hrs.
03/27/24	Telephone conference with S. Gersten, Sage and FTI team regarding data and sandbox issues (.8); review multiple emails regarding same (.4).	
	Jennifer L. Nassiri	1.20 hrs.
03/27/24	Commence review of audit and other financial documents (.8).	
	Jennifer L. Nassiri	.80 hrs.
03/27/24	Review correspondence regarding BPM documents (multiple emails) (.3); telephone conference with M. Flanagan, S. Gersten and Ghallager team regarding insurance policies and real property values (.3).	
	Jennifer L. Nassiri	.60 hrs.
03/27/24	Reviewed and revised stipulation regarding third party administrative claims related to committee discovery (.6).	
	Jeannie Kim	.60 hrs.
03/28/24	Reviewed items received concerning additional 2004 production.	
	Alan H. Martin	.40 hrs.
03/28/24	Telephone conference with M. Ashley, C. Johnson and S. Gersten regarding response to CASC subpoena and coordination of same (.4). Participate in telephone conference with counsel for committee, BRG, BRiley, and S. Gersten in connection with meet and confer on outstanding documents (1.4); attention to multiple emails regarding non-debtor discovery efforts and response to subpoenas (.6).	
	Jennifer L. Nassiri	2.40 hrs.
03/28/24	Reviewed status of discussions with Catholic Charities regarding committee subpoena (.1).	

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	Jeannie Kim	.10 hrs.
03/28/24	Reviewed and revised stipulation regarding third party discovery fee stipulation (.2); corresponded with client and special litigation counsel regarding same (.3); further reviewed and revised stipulation in light of client comments (.3).	
	Jeannie Kim	.80 hrs.
03/29/24	Reviewed items received concerning additional 2004 production.	
	Alan H. Martin	.40 hrs.
03/29/24	Review correspondence in connection with document requests to insurers (.1); review correspondence from counsel for RPSC to counsel for committee in connection with objections to subpoena (.4).	
	Jennifer L. Nassiri	.50 hrs.
03/29/24	Further revised stipulation regarding third party administrative fees and costs (.1); corresponded with client team regarding same (.1); corresponded with committee counsel regarding same (.1).	
	Jeannie Kim	.30 hrs.

*Timekeeper Summary of: Discovery*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Alan H. Martin	6.90	\$ 1,032.00	\$ 7,120.80
Ori Katz	13.70	\$ 1,172.00	\$ 16,056.40
Amanda L. Cottrell	9.10	\$ 908.00	\$ 8,262.80
Jeannie Kim	2.60	\$ 804.00	\$ 2,090.40
Jennifer L. Nassiri	23.80	\$ 1,056.00	\$ 25,132.80
Steven G. Gersten	2.90	\$ 804.00	\$ 2,331.60
Matt Benz	4.00	\$ 600.00	\$ 2,400.00
<i>Totals</i>	63.00	\$ 1,006.27	\$ 63,394.80

**Written Discovery**

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03/01/24	Revise and finalize objections and responses to Stage 3 RFPs and serve DEBTOR08 production.	
	Amanda L. Cottrell	1.00 hrs.
03/13/24	Conference call with P. Carney, Fr. Summerhays, M. Flanagan, and legal team to discuss Committee's discovery to third parties.	
	Amanda L. Cottrell	.50 hrs.
03/13/24	Conference with S. Gersten on stage 4 discovery issues.	
	Amanda L. Cottrell	.50 hrs.
03/14/24	Draft and revise objections and responses to Stage 4 RFPs with focus on client files.	
	Amanda L. Cottrell	1.40 hrs.
03/15/24	Draft and revise objections and responses to Stage 4 RFPs with focus on client files.	
	Amanda L. Cottrell	2.60 hrs.
03/15/24	Edit and revise (3.4), supplement (1.9), and finalize (.4) for service on Committee counsel objections and responses to Stage 4 requests for production in the Committee's Rule 2004 subpoena.	
	Steven G. Gersten	5.70 hrs.

*Timekeeper Summary of: Written Discovery*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Amanda L. Cottrell	6.00	\$ 908.00	\$ 5,448.00
Steven G. Gersten	5.70	\$ 804.00	\$ 4,582.80
<i>Totals</i>	<i>11.70</i>	<i>\$ 857.33</i>	<i>\$ 10,030.80</i>

## Document Production



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03/07/24	Further analysis of document production issues in connection with meet & confer process (1.6); multiple emails with S. Gersten regarding same (.2); review exhibit A to 2004 order for updated document requests (.4); review notes of custodian interviews (1.0).	Jennifer L. Nassiri	3.20 hrs.
03/11/24	Analysis of S. Gersten response in connection with document production and metadata issues (.2).	Jennifer L. Nassiri	.20 hrs.
03/14/24	Telephone conference with D. Egan and committee counsel regarding Cemeteries production of documents (.3); review correspondence from S. Williamson regarding follow up call to discuss same (.1); prepare correspondence to team summarizing call with Committee (.1); analysis of multiple emails regarding production of real property information (.2).	Jennifer L. Nassiri	.70 hrs.
03/15/24	Review draft responses to stage 4 requests for production and related emails (.6).	Jennifer L. Nassiri	.60 hrs.
03/15/24	Telephone conference with R. Charles and S. Gersten regarding subpoena and RPSC document production issues (.3); telephone conference with P. Califano and S. Gersten regarding Seminary production issues (.7).	Jennifer L. Nassiri	1.00 hrs.
03/18/24	Review correspondence and subpoena regarding responsive documents in possession of Cemeteries (.4); review of produced documents (.4); prepare correspondence to A. Cottrell regarding third party subpoenas (.1).	Jennifer L. Nassiri	.90 hrs.
03/22/24	Analysis of multiple emails in connection with response to committee on status of production of documents (.4).	Jennifer L. Nassiri	.40 hrs.
03/25/24	Analysis of produced financial documents in connection with forthcoming calls to address discovery issues.		

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	Jennifer L. Nassiri	2.80 hrs.
03/26/24	Further review of produced documents and emails with S. Gersten regarding same (1.7).	
	Jennifer L. Nassiri	1.70 hrs.
03/27/24	Participate in telephone conference with B. Michael, A. Caine and S. Gersten regarding meet and confer on document production (.4).	
	Jennifer L. Nassiri	.40 hrs.
03/27/24	Analysis of B. Riley fileshare in connection with produced documents and multiple emails regarding same (.7).	
	Jennifer L. Nassiri	.70 hrs.
03/27/24	Corresponded with S. Gersten regarding documents to produce in response to committee subpoena (.2).	
	Jeannie Kim	.20 hrs.
03/28/24	Further analysis of produced documents in connection with upcoming mediation/ plan strategy (2.5).	
	Jennifer L. Nassiri	2.50 hrs.
03/29/24	Analysis of multiple emails from S. Gersten regarding additional production (.2).	
	Jennifer L. Nassiri	.20 hrs.

*Timekeeper Summary of: Document Production*

<u>Timekeeper</u>	<u>Hours</u>	<u>Average Rate/Hr</u>	<u>Dollars</u>
Jeannie Kim	0.20	\$ 804.00	\$ 160.80
Jennifer L. Nassiri	15.30	\$ 1,056.00	\$ 16,156.80
<i>Totals</i>	15.50	\$ 1,052.75	\$ 16,317.60

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<b><u>Timekeeper</u></b>	<b><u>Hours</u></b>	<b><u>Average Rate/Hr</u></b>	<b><u>Dollars</u></b>
Amanda L. Cottrell	15.10	\$ 908.00	\$ 13,710.80
Ori Katz	30.10	\$ 1,172.00	\$ 35,277.20
Alan H. Martin	14.20	\$ 1,032.00	\$ 14,654.40
Jennifer L. Nassiri	40.20	\$ 1,056.00	\$ 42,451.20
Matt Benz	4.00	\$ 600.00	\$ 2,400.00
Steven G. Gersten	8.60	\$ 804.00	\$ 6,914.40
Jeannie Kim	41.50	\$ 804.00	\$ 33,366.00
Eduardo G. Linares	3.30	\$ 556.00	\$ 1,834.80
Fee Discount			\$ -28,635.20
<b>Total Fees for Professional Services</b>			<b>\$ 126,608.80</b>

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**ACCOUNTS RECEIVABLE SUMMARY**

Invoice Date	Invoice Number	Invoice Amount	Fees	Disbs	Tax	Retainer / On-Account	Payments & Credits	Total
12/14/23	380098012	146,098.17	145,627.60	470.57	0.00	0.00	-116,972.25	\$ 29,125.92
01/17/24	380098510	129,298.90	129,008.40	290.50	0.00	0.00	-103,439.12	25,859.78
02/15/24	380100158	187,709.64	183,955.60	3,754.04	0.00	0.00	-150,918.52	36,791.12
03/19/24	380101461	134,945.60	134,889.70	55.90	0.00	0.00	-36,455.76	98,489.84
Total Outstanding Fees, Disbursements, Taxes and Other								\$ 190,266.66
Interest on Outstanding A/R								0.00
Fees and Disbursements Due for this Invoice								126,608.80
<b>Total Due For This Matter</b>								<b>\$ 316,875.46</b>